

REMARKS/ARGUMENTS

The Applicants originally submitted Claims 1-9 in the application. In previous responses, the Applicants amended Claims 1, 3-9 and 11, added Claims 10-12, and canceled Claims 1-2 without prejudice or disclaimer. Accordingly, Claims 3-12 are currently pending in the application.

I. Rejection of Claims 3-4, 6, 10 and 12 under 35 U.S.C. §102

The Examiner has rejected Claims 3-4, 6, 10 and 12 under 35 U.S.C. §102(e) as being anticipated by "Minimum Classification Error (MCE) Model Adaptation of Continuous Density HMMs," Eurospeech-2003, September 1-4, 2003, 1629-1632 by He, *et al.* ("He"). The Applicants respectfully disagree.

He relates to MCE model adaptation for continuous density HMMs based on a super string model approach. (*See* Abstract.) The Examiner asserts He discloses each limitation of independent Claim 12 and relies on section 4.1 of He to disclose a "scaling factor" and "calculating a new scaling factor by adding a correction item to a previous scaling factor." (*See* Examiner's Action, page 3.)

The Guassian component of He, however, is not a scaling factor as asserted by the Examiner. On the contrary, the Guassian component is a Gaussian distribution used by the HMM **to model** the distribution of a speech signal. (*See*, for example, paragraph 12 of the application.) Furthermore, even assuming *arguendo* that the Gaussian component is a scaling factor, the Applicants fail to find where section 4 of He discloses **adding** a correction item to a Guassian component to calculate a new Guassian component. The Applicants also fail to find where section 4 of He discloses updating

the Gaussian component **each time new data is available**. The Applicants respectfully request the Examiner to indicate otherwise in He if the Examiner disagrees.

Accordingly, at least based on the above arguments, He fails to disclose each limitation of Claim 12 and also fails suggests each limitation as applied by the Examiner. As such, the Applicants respectfully request the Examiner to withdraw the §102 rejection with respect to Claim 12 and Claims 3-4, 6 and 10 which depend thereon and allow issuance thereof.

II. Rejection of Claims 5, 7-9 and 11 under 35 U.S.C. §103

The Examiner has rejected Claims 5, 7-9 and 11 under 35 U.S.C. §103(a) as being unpatentable over He in view of: U.S. Patent No. 5,924,065 to Eberman, *et al.* ("Eberman") for Claims 5, 7 and 9; U.S. Patent No. 6,266,638 to Stylianou ("Stylianou") for Claim 8; and U.S. Patent Application Publication No. 2002/0026253 to Rajan ("Rajan") for Claim 11. The Applicants respectfully disagree.

As argued above, He fails to provide a *prima facie* case of obviousness of independent Claim 12. Eberman, Stylianou and Rajan have not been cited to cure the deficiencies of He regarding independent Claim 12 but to disclose the additional limitations of the above dependent Claims. As such, the cited combination of He with Eberman, Stylianou or Rajan do not provide a *prima facie* case of obviousness of Claim 12 and Claims dependent thereon. The Applicants therefore respectfully request the Examiner withdraw the §103(a) rejection of Claims 5, 7-9 and 11 and allow issuance thereof.

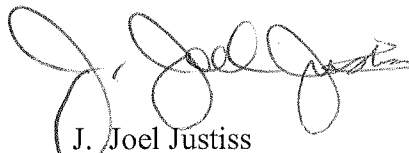
III. Conclusion

In view of the foregoing remarks, the Applicants now see all of the Claims currently pending in this application to be in condition for allowance and therefore earnestly solicit a Notice of Allowance for Claims 3-12.

The Applicants request the Examiner to telephone the undersigned attorney of record at (972) 480-8800 if such would further or expedite the prosecution of the present application. The Commissioner is hereby authorized to charge any fees, credits or overpayments to Deposit Account 20-0668.

Respectfully submitted,

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